REMARKS

These remarks, submitted in response to the Office Action dated December 24, 2003, are

believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable

reconsideration on the merits is respectfully requested.

Claims 19 and 20 are added. Accordingly, claims 1-20 are all the claims pending in the

present application.

Claims 1-18 have been rejected under 35 U.S.C. § 102(e) as being anticipated by

Reynolds et al. (U.S. 6,411,993). Applicant submits the following in traversal of the rejection.

Reynolds discloses an interactive web book (Ibook) system which allows information to

be contributed to the World Wide Web. Users can enroll with an Ibook as viewers or

contributors. Viewers are permitted to view the Ibooks and contributors are permitted to

contribute information to the Ibooks. Information regarding the viewers, contributors, the length

of time users view an Ibook and the web pages within Ibooks is stored in databases within an

Ibook server. Viewers are billed for the length of time they access information in an Ibook and

contributors are rewarded based on the extent their contributed material is viewed by users. See

Abstract.

Claim 1

Claim 1 recites providing a functional layer for interfacing over a network with a user via

a user interface and interfacing with a data repository containing a plurality of content entities.

Claim 1 requires that the functional layer comprises a plurality of function modules, and each

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module executes a function pertaining to the creation or manipulation of a compilation of content

selected from the plurality of content entities by the user.

The Examiner asserts that databases 66-76 shown in Fig. 3 of Reynolds disclose the data

repository containing a plurality of content entities as recited in claim 1 presumably taking the

position that the plurality of databases are a plurality of content entities. Reynolds describes

databases 66-76 as databases within an Ibook server 56. For example, database 76 is a database

of Ibook web pages, database 66 is a database containing information about users who can view

the Ibook and database 68 is a database containing information about users who can contribute to

the Ibook. Among databases 66-76, Reynolds discloses that only Ibook web pages database 76

contains information for web pages for an Ibook (the web pages were cited for teaching the

claimed compilation of content). Therefore, under the Examiner's reading of Reynolds it

discloses at most one content entity (database 76 as cited by the Examiner) and not a plurality of

content entities used by a user for the compilation of content.

Furthermore, the information within the Ibook web pages database 76 is information that

the creators of the Ibook have already selected for inclusion in an Ibook. See col. 5, lines 26-29.

Reynolds does not disclose that the content forming the compilation is selected from database

76, since database 76 stores data which has already been selected for inclusion in an Ibook.

Accordingly, database 76 does not contain content that a user selects for inclusion in the

compilation, as required by claim 1.

The Examiner asserts that the server must inherently include a plurality of modules to

handle the functions of the Ibook server application 64. However, the Examiner merely asserts

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that the server must include a plurality of modules without providing any basis in fact or

technical reasoning. See MPEP § 2112. Applicant respectfully requests that the Examiner

provide a basis in fact or technical reasoning to support the position that the server must

inherently include a plurality of modules, instead of only providing merely a conclusory

statement to that effect.

Reynolds also does not disclose returning information concerning the compilation of

content in response to a user request, as required by claim 1, but rather discloses returning only

the content itself, i.e., a "passage". See col. 11, lines 48-50.

For the above reasons, it is respectfully submitted that claim 1 and its dependent claims

are not anticipated by Reynolds. Since claims 6 and 11 recite similar elements, claims 6 and 11

and their dependent claims are patentable for at least the same reasons.

Claim 2

Claim 2 recites that one of the function modules creates a list of content entity identifiers

defining the content and order of a compilation.

The Examiner asserts that server application 64 of Reynolds corresponds to the elements

of claim 2. In particular, the Examiner asserts that the server application 64 causes information

to be stored in databases including the identity of the contributor of a passage and times/dates of

the creation of passages. See col. 9, lines 36-50.

However, Reynolds does not teach that the identity of a passages' creator identifies a content entity, nor does it teach that the time and date that a passage is created defines an order of the compilation.

Server application 64 was cited for teaching a functional layer and not the function modules of claim 1. As previously indicated, the Examiner has not established where Reynolds discloses a plurality of modules. The Examiner merely asserts that Reynolds inherently discloses a plurality of functions modules without providing a basis for the assertion. Therefore, the Examiner has not established that one of the function modules creates a list of content entity identifiers defining the content and order of a compilation, as required by claim 1.

The Examiner also asserts that the databases include identities and time/date information which identify the order information and that the databases can include an index or list, citing col. 9, lines 36-50. The respective column and lines cited by the Examiner disclose the storage of passage information and the creation of passage characteristics. It appears the Examiner is referring to passage characteristics for disclosing the identifiers of claim 2.

Reynolds discloses that passage characteristics can be determined based on a contributor ID or passage characteristics can be entered by a the contributor. See col. 9, lines 50-55. Assuming the server application 64 is deemed to teach the plurality of function modules recited in claim 1, there is no indication in Reynolds that one of the function modules creates a list of content entity identifiers defining the content and order of a compilation. More particularly, the passage characteristics disclosed by Reynolds are based on a contributor ID or are entered by a

user. It is respectfully submitted that Reynolds does not disclose creating a list of content entity identifiers, and hence, does not anticipate the claims.

Furthermore, the passage characteristics do not define the content and order of a compilation. A passage is a part of a compilation and passage characteristics relate to information about the passage, (see col. 9, lines 36-41), but Reynolds does not disclose that passage characteristics define the content and order of the passage.

For the above reasons, claim 2 should be deemed patentable. Since claims 7 and 12 recite similar elements, claims 7 and 12 and their dependent claims should be deemed patentable for the same reasons.

Claim 3

Claim 3 recites that at least one of the function modules manipulates the list of content entity identifiers to redefine the content or order of the compilation. The Examiner has not established where this feature is disclosed in the prior art. Furthermore, Reynolds neither teaches nor suggests that the passage characteristics (identifiers as cited by the Examiner) are redefined, as required by claim 3. Therefore, claim 3 should be deemed patentable.

Since claims 5, 8, 10, 13 and 15 recite similar elements, they should be deemed patentable for the same reasons.

Applicant has added claims 19 and 20. These new claims are supported at least at pg. 9, lines 17-25. Claims 19 and 20 should be deemed patentable at least by virtue of their dependency to patentable claims for the reasons set forth above.
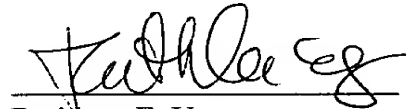
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In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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